

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
 v.)
)
 AMEREN MISSOURI,)
)
 Defendant.)

Case No. 4:11-CV-00077-RWS

Judge Rodney W. Sippel

**AMEREN MISSOURI’S UNOPPOSED MOTION FOR ENLARGEMENT
OF TIME TO TAKE TWO DEPOSITIONS AFTER THE DISCOVERY CUT-OFF**

Defendant Ameren Missouri (“Ameren”) respectfully asks the Court to grant leave for Ameren to take two depositions after September 19, 2014. In support of this motion, Ameren states as follows:

1. On July 28, 2014, this court ordered that the parties shall complete all discovery no later than September 19, 2014 (ECF # 312).

2. Ameren respectfully requests that the Court grant leave for Ameren to take the following two Rule 30(b)(6) depositions of Plaintiff after September 19, 2014: (1) Deposition of Plaintiff (Various Topics); and (2) Deposition of Plaintiff (Capable of Accommodating and Other Emissions Issues).

3. Ameren previously noticed both of these depositions for dates prior to September 19, 2014. However, Ameren now requests later dates for these depositions to accommodate the travel and work schedules of the EPA witness and counsel for Ameren. Scheduling these depositions for later dates conserves both party and witness resources, because the new schedule

would allow the EPA witness and Ameren's counsel to travel once, instead of twice, for these depositions.

4. Counsel for Ameren has conferred with counsel for Plaintiff. Plaintiff has advised that it does not oppose the extension. Ameren and Plaintiff have conferred to schedule new dates for these depositions. The parties and witness are available for the Deposition of Plaintiff (Capable of Accommodating and Other Emissions Issues) on October 2, 2014. The parties and witness are available for the Deposition of Plaintiff (Various Topics) on October 3, 2014. Accordingly, Ameren requests that the Court grant leave for Ameren to take these depositions on October 2nd and October 3rd, respectively.

WHEREFORE, Ameren Missouri respectfully requests that the Court grant the relief sought in this motion.

Dated: September 16, 2014

Respectfully submitted,

/s/ Matthew B. Mock

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CERTIFICATE OF SERVICE

I hereby certify that on September 16, 2014, I electronically filed the foregoing unopposed motion with the Clerk of Court using the CM/ECF system, which will cause an electronic copy to be served on counsel of record, who are listed below:

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